

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
)
SHAWN SANDLER)
)

JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(A)

Pursuant to Local Rule 116.5(A), the United States and Defendant Shawn Sandler (collectively, the "parties") state as follows:

(1) Based on additional discovery the government anticipates providing regarding prospective witnesses, the defendant seeks two weeks following the receipt of these materials in which to submit a discovery request. Otherwise the parties do not seek relief from the applicable timing requirements imposed by L.R. 116.3.

(2) The government anticipates calling one or more expert witnesses should the case go to trial and the defendant requests discovery concerning these expert witnesses. The government requests that it be required to disclose such discovery 30 days prior to trial; the defendant requests that such discovery be disclosed 45 days before trial. The government also requests reciprocal discovery from the defendant 14 days prior to trial.

(3) The government anticipates providing additional discovery.

(4) At present, the defendant is unsure but believes it is possible he will file a motion to suppress statements, and

therefore requests that a motion date for filing the motion be established under Fed. R. Crim. P. 12(c).

(5) The parties propose that the Court enter an order excluding the 28-day time period following the defendant's arraignment.

(6) At present, the parties anticipate a trial and estimate it would last approximately five to seven days.

(7) The parties propose that the Court convene a final status conference in mid-August, 2004.

SHAWN SANDLER
By His Attorney

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By:

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June 30, 2004